

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of	)	
	)	
Wireline Competition Bureau Seeks Focused	)	WC Docket No. 13-184
Comment on E-Rate Modernization	)	

COMMENTS OF WESLACO INDEPENDENT SCHOOL DISTRICT  
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## **Introduction**

Weslaco Independent School District is a large, semi-rural district located in the Rio Grande Valley, near the southern tip of Texas. Weslaco Independent School District serves approximately 17,900 students, from preschool through grade 12.

The Weslaco Independent School District student population is over 96 percent Hispanic, with 83.7 percent of students eligible for free or reduced meals and 1,260 students from Migrant

families who typically arrive late in the school year, and depart before the end of the school year because the families migrate to northern states to find agricultural work.

19.8 percent of Weslaco Independent School District students participate in Honors, AP and/or Dual Enrollment programs, and 4,155 of our students are English Language Learners.

There are currently 11 Elementary, 4 Middle, 2 High schools, 1 alternative self-paced High School for students with children and drop-outs returning to complete their graduation requirements, plus 1 disciplinary Alternative campus

Weslaco Independent School District has participated in the E-Rate Program since its inception and appreciates the opportunity to present the following comments in response to the Commission's Public Notice proceeding "Wireline Competition Bureau Seeks Focused Comment on E-Rate Modernization".

**¶10 – We seek comment on whether the Commission should change the current priority two funding category by allocating annually a set amount of E-rate funds which are essential to ensuring high-capacity reaches students and library patrons**

Weslaco ISD agrees with setting aside a portion of the E-Rate funds to be used by Districts that are building new schools to augment their funding allocation to purchase the additional network cabling and equipment needed to open a new facility. Other than that, Weslaco ISD firmly believes that every school eligible for E-Rate funding should be allocated a portion of the total available E-Rate funds each year using the Simplified Funding Formula included as an attachment with the FCC Public Notice (WC Docket No. 13-184) with the following modifications:

- Dissolve the current distinction between Priority 1 and Priority 2 services and allow schools to spend their funding allocation on eligible equipment and services in the way that makes the most sense for the district.
- Allow the school district to aggregate the allocations for all schools in the district and spend the portion of their total allocation at each campus that they believe best meets the needs of their schools and the district as a whole.
- Remove the 2-in-5 rule which currently leads to over-buying.

Implementing the Simplified Funding Formula with these modifications provides an amount of money each year that schools can plan on, equitably distributes funds among all eligible entities, and provides incentive for districts to spend their allocation wisely.

**¶11 – We seek comment on whether internal wiring, switches and routers, wireless access points, and the software supporting these components are the right categories of equipment and software to fund for the purpose of getting high-capacity broadband from the building’s front door to the computer, tablet, or other learning devices in schools and libraries**

WISD agrees that this basic classification of equipment represents the equipment necessary to provide the basic infrastructure for providing high-speed internet access to the end user devices. This equipment and software should continue to be funded by E-Rate.

**¶12 – We seek further focused comment on what services, software or equipment are necessary to enable high quality, high-capacity networks inside schools and libraries, and whether such services, software and equipment should qualify for support**

Additional equipment and services are necessary in order to provide a safe and secure computing environment. The firewall is an example of this type of equipment. Without an

adequate firewall, the school or library network becomes more exposed to hacking attempts. Many schools and libraries that currently have existing firewalls will likely need to upgrade these devices as they increase the capacity of their Internet connection.

Traffic shaping appliances/services should qualify for E-Rate funding as they provide a tool to mitigate unwanted network Internet traffic, freeing up valuable Internet bandwidth. Traffic shaping (also known as "packet shaping") is a computer network traffic management technique which delays some or all datagrams to bring them into compliance with a desired traffic profile. Traffic shaping is a form of rate limiting, which increases usable bandwidth for some kinds of packets by delaying other kinds. In this case the users will experience a low quality service and may get the misleading impression that a site is inherently slow or unreliable which eventually may lead to preference of other sites between users.<sup>1</sup> A traffic shaping appliance can assist schools in limiting traffic to less desirable sites that, because of heavy usage, are limiting available bandwidth needed for instructional purposes.

Network security management for wireless devices should also be eligible for E-Rate discount. With the implementation of 1:1 initiatives and Bring Your Own Device (BYOD) initiatives, schools are bombarded with not only traffic on their network, but a combination of school-owned and private mobile devices. Ensuring that these private mobile devices are properly restricted on the network is vital to maintaining a secure network.

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<sup>1</sup> [http://en.wikipedia.org/wiki/Traffic\\_shaping](http://en.wikipedia.org/wiki/Traffic_shaping)

Caching appliances and services provide a unique opportunity to actually reduce the necessary bandwidth needed by a school or district by selectively and intelligently storing information for web pages that are being accessed, allowing subsequent requests for the same web page to be displayed from the cache rather than requiring that the page be retrieved from the Internet a second or third time.

Content Filtering is not currently eligible for E-Rate discount, but is required in order to be compliant and able to receive E-Rate funding. This unfunded mandate places a burden on schools but provides no financial assistance for acquisition. As with the firewall, as schools and libraries increase their Internet capacity, the filtering solution needs to scale-up to meet increased bandwidth requirements.

Metropolitan area network (MAN) fiber connectivity between schools, even if the connection crosses public roadways, should be eligible for E-Rate funding. School Districts have two basic options to provide Internet access to schools; (1) purchase a connection from the Internet service provider to each school, or (2) purchase a single connection to the District network operations center (NOC) from the Internet service provider, and then provide connectivity from the NOC to each school to share the single high-capacity broadband Internet connection.

In the first scenario, the cost for Internet access for multiple smaller Internet connections to each school is going to be more than the cost for the same aggregated bandwidth delivered to the NOC. Additionally, if a separate Internet connection is delivered to each campus, and some

campuses are not fully utilizing the entire amount of that bandwidth, there is no easy way to share the excess bandwidth with a campus that is utilizing 100% of its Internet bandwidth.

With the second scenario, you achieve economy of scale by being able to purchase one large Internet connection, which means the amount of E-Rate funding required for the same amount of high-capacity internet connectivity at the schools is less. This single Internet “pipe” is also shared among all schools, so it is easier to use a greater percentage of what is being paid for without some campuses suffering from not having enough bandwidth, and some bandwidth at other schools sitting idle. The issue that needs to be addressed is that there still needs to be a means to share that single high-capacity Internet connection with the schools. This can be accomplished by leasing a telecom circuit between the NOC and each school, or by installing a fiber-optic cable or microwave link between the NOC and each school.

Lease costs for the telecom circuit are an ongoing Priority 1 service cost, and will likely offset (or more likely exceed) the E-Rate savings gained by moving to a single, larger Internet connection. The microwave link is a one-time cost, and the equipment should last for 5-7 years. There are, however, limitations on throughput, and even if it is available, the cost for 10 Gbps microwave connectivity is probably cost prohibitive. Allowing school Districts to install fiber-optic cable to connect their NOC to each campus provides a one-time cost. The fiber-optic cable is currently capable of transmitting at speeds of 1 Gbps up to 10 Gbps or even 40 Gbps at a reasonable cost for the proper fiber-optic transmit modules.



Weslaco ISD has found that fiber-optic cable, installed using directional boring, is the most cost-effective long-term solution for us to provide connectivity for our school district. As such, Weslaco ISD would like to see the cost of installation of private fiber-optic cable between a school district network operations center and each school in the district added to the eligibility list. Weslaco ISD has installed over 26 miles of fiber-optic cable connecting almost all of our schools and is able to provide 10 Gbps redundant connections to every campus with no monthly recurring cost for transport circuits. In a study conducted in 2011, Weslaco ISD calculated that to lease the circuits necessary to provide the 1 Gigabit and 10 Gigabit connections that we were providing to each of our campuses would have cost approximately \$12,957,840 per year. That breaks down to \$11,532,477 in E-rate funding and \$1,425,362 in school funding. If Weslaco ISD had not invested \$1.8m to install this private fiber-optic ring, we would not be able to provide the same level of connectivity to our schools that we are now able to provide. Unnecessary leasing of telecommunications circuits that could be replaced over time with school owned fiber-optic cable amounts to hundreds of millions of dollars annually. For Weslaco ISD alone, we are NOT requesting \$11.5m in E-Rate funding each year solely because we own our own fiber to most of our schools.

**¶13 – We seek comment on ways to provide more widespread access to funding for internal connections in order to enable schools and libraries nationwide to take advantage of high-capacity broadband to their buildings with robust internal networks**

Weslaco ISD firmly believes that the best way to ensure that the largest number of schools are able to take advantage of E-Rate funding would be to allocate a portion of the total available E-Rate funds each year using the Simplified Funding Formula included as an

attachment with the FCC Public Notice (WC Docket No. 13-184) with the following modifications:

- Dissolve the current distinction between Priority 1 and Priority 2 services and allow schools to spend their funding allocation on eligible equipment and services in the way that makes the most sense for the district.
- Allow the school district to aggregate the allocations for all schools in the district and spend the portion of their total allocation at each campus that they believe best meets the needs of their schools and the district as a whole.
- Remove the 2-in-5 rule which currently leads to over-buying.

Implementing the Simplified Funding Formula with these modifications provides an amount of money each year that schools can plan on, equitably distributes funds among all eligible entities, and provides incentive for districts to spend their allocation wisely.

**¶14 – We seek comment on limiting an applicant’s ability to receive internal connections funding to once every five years while retaining the existing prioritization method.**

Weslaco ISD opposes limiting internal connections to 1-in-5 years, and advocates for the repeal of the 2-in-5 rule. However, if the determination is made to continue with any form of “X-in-Y years” model, the network operations center should be eligible for E-Rate funding as an independent entity, and not count against any of the schools.

These artificial restrictions force schools to over-buy in the years that they are funded. The 2-in-5 rule was originally established because schools with lower discount percentages were

not being funded. It was believed that by only allowing schools to purchase internal connections 2 years out of every 5 years, that funding would naturally become available to the lower percentage discount schools over time. What ended up happening was that schools went all out in the years that they could purchase, and absorbed all available funds well before internal connection funds were available to schools in the lower brackets. Additionally, since the network operations center impacts every school served, it makes it very difficult to plan upgrades as they are needed and further forces schools to replace equipment more often than necessary for fear of missing an opportunity in one of the purchase years.

By implementing the Simplified Funding Formula with modifications, as described in ¶10 above, there would be less inclination to over-buy. The inclination would shift to determining the best methodology for spending the funds that were allocated to the district. Additionally, since the annual E-Rate funds available for each year would be equitably allocated across ALL schools, every school could count on E-Rate funding EVERY year, and schools would begin to think about the best ways to spend what they were allocated.

There would need to be some amount of the E-Rate funds set aside for new schools. Districts building new schools would receive an additional allocation for each new school based on the size of the school. These one-time additional funds would be available to help build out the network in the new school. The amount should be equal to the average nation-wide cost to wire and equip a school of the size being built.

**¶15 – If the Commission were to adopt a five-year upgrade cycle approach, should the one-in-five limitation apply at the level of applicants or, as it does today, at the level of individual school and library building?**

Weslaco ISD adamantly opposes the one-in-five limitation. However, if it is to be implemented, the rule should apply at the school level, and additionally the network operations center, which currently counts against every school that it services, should be considered a separate eligible entity for funding purposes.

**¶16 – If available funding is insufficient to fund all applicants at a particular discount level in a given funding year, how should the Commission decide which applicants to fund?**

Decisions should be made based on a formula that gives preference to schools with a high level of socio-economic disadvantaged students (free and reduced lunch program). Weslaco ISD opposes any decision on funding based on measuring cost per student served. While giving preference based on lower cost per student served seems like a way to encourage cost effective solutions, this approach can be misleading. Take the following scenario:

- Two identical Middle Schools (A and B) in the same district, each with a student population of 800, and each with a 1Gbps fiber connection to the district network operations center.
- The district network operations center has a single 2Gbps broadband connection to the Internet.
- Approximately 30% of online core curriculum content is through Internet-based software subscriptions. The remaining 70% of online core curriculum content is hosted locally on servers in the district network operations center.

- Each Middle School already has enough wireless access points to provide ubiquitous Internet access across the campus.
- School A is requesting 25 additional wireless access points, at a cost of \$800 each, for a total cost of \$20,000, or \$25 per student served.
- School B is requesting upgrade of the school core router to accommodate a 10Gbps connection to the district network operations center, at a cost of \$30,000, or \$37.50 per student served.

Taken simply as a factor of least cost per student served, School A's request should take priority, but adding 25 more wireless access points to a school that already has adequate wireless coverage will not significantly improve network access. School B's request, while costing 50% more per student served, is probably going to have much more impact on a student's ability to access content, both from the district servers and the Internet.

Each situation is complex, and very unique. No two schools or libraries are alike. Each entity requires a carefully considered solution to best meet the needs that it is attempting to address with each E-Rate application. It cannot be reduced to an equation of a dollar cost per student served.

This following is a ridiculous example, but if two schools were submitting requests to address roof leaks, would it make sense to put more weight to the request for a large piece of plastic for \$500 as opposed to hiring a roofing company to redo the roof for \$150,000? Obviously not! The solution needs to be the best fit for the needs of the

school or library. Containment of costs can be addressed more effectively by ensuring that the school/library shares in the cost (as they do now) and that the amount of funds they have available to them in any given year are limited (as in an allocation per school/library) that they can work within to best meet their needs.

**¶17 – We seek comment on limiting an applicant’s ability to receive funding for internal connections that support high-capacity broadband to a single funding year until all other applicants have received support or declined the opportunity to seek funding in at least one funding year, starting in funding year 2015.**

Weslaco ISD is opposed to this methodology for attempting to spread funding across all schools over time. Because it will be unclear on how long it would be before funding became available again, this methodology will result in schools over-purchasing in the years that they are funded in a manner similar to what we are seeing with the current 2-in-5 rule. This methodology would also punish districts that are growing, since new facilities built mid cycle would not be eligible for funding. Finally, the uncertainty of when funds would be available next, and how much would be allocated to the school, would not allow staff to properly plan for funding – feast and famine.

**¶18 – Should the rotating eligibility limitation apply at the level of applicants or, as the two-in-five rule does today, at the level of individual schools and library?**

WISD does not support rotating eligibility, but if implemented it should be at the individual school/library level so that new schools/libraries being built are immediately eligible in the year they come online. Additionally, the network operations center would need to be considered an eligible entity.

**¶19 – If funding is insufficient to fund all eligible applications at a particular discount level in a given funding year, should the Commission give preference to the applicants with the highest percentage of students receiving free and reduced school lunches?**

Yes.

**¶20 – We seek comment on adopting a funding method that would provide some support for internal connections that support high capacity broadband to all eligible applicants in each funding year, as opposed to the cyclical funding method described above.**

Weslaco ISD firmly believes that the best way to ensure that the largest number of schools are able to take advantage of E-Rate funding would be to allocate a portion of the total available E-Rate funds each year using the Simplified Funding Formula included as an attachment with the FCC Public Notice (WC Docket No. 13-184) with the following modifications:

- Dissolve the current distinction between Priority 1 and Priority 2 services and allow schools to spend their funding allocation on eligible equipment and services in the way that makes the most sense for the district.
- Allow the school district to aggregate the allocations for all schools in the district and spend the portion of their total allocation at each campus that they believe best meets the needs of their schools and the district as a whole.
- Remove the 2-in-5 rule which currently leads to over-buying.

Implementing the Simplified Funding Formula with these modifications provides an amount of money each year that schools can plan on, equitably distributes funds among all eligible entities, and provides incentive for districts to spend their allocation wisely.

**¶20 – There is concern that this funding approach would not fully capture the diversity of costs faced by applicants across the country. Are these concerns mitigated in the context of internal connections, particularly LAN and Wi-Fi deployments?**

While labor costs may vary some between locations, Weslaco ISD believes that the cost of equipment should be virtually the same across the U.S.

**¶21 – We seek comment on using a simplified version of the formula proposed by Funds for Learning and a coalition of schools and school groups to set available funding levels for each applicant.**

Weslaco ISD firmly believes that every school eligible for E-Rate funding should be allocated a portion of the total available E-Rate funds each year using the Simplified Funding Formula included as an attachment with the FCC Public Notice (WC Docket No. 13-184) with the following modifications:

- Dissolve the current distinction between Priority 1 and Priority 2 services and allow schools to spend their funding allocation on eligible equipment and services in the way that makes the most sense for the district.
- Allow the school district to aggregate the allocations for all schools in the district and spend the portion of their total allocation at each campus that they believe best meets the needs of their schools and the district as a whole.
- Remove the 2-in-5 rule which currently leads to over-buying.

Implementing the Simplified Funding Formula with these modifications provides an amount of money each year that schools can plan on, equitably distributes funds among all eligible entities, and provides incentive for districts to spend their allocation wisely.



**¶22 – In addition to ensuring that all applicants have the opportunity to receive at least some internal connection funding each year, adopting this annual allotment could have the benefit of providing applicants certainty about the amount of funding that would be available to them each year. We seek comment on this consideration.**

Weslaco ISD agrees that this methodology provides a defined “budget” that schools/libraries could use to pay for equipment, upgrades and/or maintenance of existing equipment. By providing that predictable “budget” amount, schools would be able to plan better. Additionally, because there is a predictable “budget,” schools could begin to think more long-term, allowing them to identify more cost effective ways to purchase and deploy equipment and services.

**¶22 – We also seek comment on how to best utilize any remaining funding if some applicants request less than their allocated amount.**

Unexpended funds should be held over to subsequent years and reallocated across all schools.

**¶22 – Should district or library systems be required to spend those funds at specific schools or libraries in certain proportions? Or should each applicant have the flexibility to spend the funds as it decides across the district or library system?**

Weslaco ISD advocates for school districts to have maximum flexibility to spend at the schools that make the most sense to the district or library system in light of their long-term plans and goals.

**¶23 – Are there variations on the options described above or other methods the Commission should consider employing to prioritize funding for high-capacity internal connections?**

Weslaco ISD contends that the “Students impacted per dollar spent” model **is not** a good measure. Each campus/library is unique at any given point in time, and it is essential to provide the school district or library system the maximum flexibility in determining what project best meets their needs.

The Simplified Funding Formula, with modifications discussed in ¶10, provides the most equitable distribution of E-Rate funds. Beyond that, providing additional funds for new construction to help offset the initial cabling of the building would seem prudent.

**¶26 – We seek comment on whether the Commission should undertake a limited initiative, within the existing priority one system, to incent the deployment of high-capacity broadband connections to schools and libraries, and what types of fiber-deployment or other high capacity, scalable broadband technologies that meet the connectivity goals in the E-rate Modernization NPRM, should be eligible for funding.**

Weslaco ISD advocates for the addition of Metropolitan Area Network fiber-optic cable installations to the services eligibility list. Metropolitan area network (MAN) fiber connectivity between schools, even if the connection crosses public roadways, should be eligible for E-Rate funding. School Districts have two basic options to provide Internet access to schools; (1) purchase a connection from the Internet service provider to each school, or (2) purchase a single connection to the District network operations center (NOC) from the Internet service provider, and then provide connectivity from the NOC to each school to share the single high-capacity broadband Internet connection.

In the first scenario, the cost for Internet access for multiple smaller Internet connections to each school is going to be more than the cost for the same aggregated bandwidth delivered to the NOC. Additionally, if a separate Internet connection is delivered to each campus, and some campuses are not fully utilizing the entire amount of that bandwidth, there is no easy way to share the excess bandwidth with a campus that is utilizing 100% of its Internet bandwidth.

With the second scenario, you achieve economy of scale by being able to purchase one large Internet connection, which means the amount of E-Rate funding required for the same amount of high-capacity internet connectivity at the schools is less. This single Internet “pipe” is also shared among all schools, so it is easier to use a greater percentage of what is being paid for without some campuses suffering from not having enough bandwidth, and some bandwidth at other schools sitting idle. The issue that needs to be addressed is that there still needs to be a means to share that single high-capacity Internet connection with the schools. This can be accomplished by leasing a telecom circuit between the NOC and each school, or by installing a fiber-optic cable or microwave link between the NOC and each school.

Lease costs for the telecom circuit are an ongoing Priority 1 service cost, and will likely offset (or more likely exceed) the E-Rate savings gained by moving to a single, larger Internet connection. The microwave link is a one-time cost, and the equipment should last for 5-7 years, however, there are limitations on throughput, and if available the cost for 10 Gbps microwave connectivity is probably cost prohibitive. Allowing school Districts to install fiber-optic cable to connect their NOC to each campus provides a one-time cost. The fiber-optic cable is currently

capable of transmitting at speeds of 1 Gbps up to 10 Gbps or even 40 Gbps at a reasonable cost for the proper fiber-optic transmit modules.

Weslaco ISD has found that fiber-optic cable, installed using directional boring, is the most cost-effective long-term solution for us to provide connectivity for our school district. As such, Weslaco ISD would like to see the cost of installation of private fiber-optic cable between a school district network operations center and each school in the district added to the eligibility list. Weslaco ISD has installed over 26 miles of fiber-optic cable connecting almost all of our schools and is able to provide 10 Gbps redundant connections to every campus with no monthly recurring cost for transport circuits. In a study conducted in 2011, Weslaco ISD calculated that to lease the circuits necessary to provide the 1 Gigabit and 10 Gigabit connections that we were providing to each of our campuses would have cost approximately \$12,957,840 per year. That breaks down to \$11,532,477 in E-rate funding and \$1,425,362 in school funding. If Weslaco ISD had not invested \$1.8m to install this private fiber-optic ring, we would not be able to provide the same level of connectivity to our schools that we are now able to provide. Unnecessary leasing of telecommunications circuits that could be replaced over time with school owned fiber-optic cable amounts to hundreds of millions of dollars annually. For Weslaco ISD alone, we are NOT requesting \$11.5m in E-Rate funding each year solely because we own our own fiber to most of our schools.

**¶27 – We seek comment on how to ensure that broadband deployment to schools and libraries is done in a way that minimizes the recurring costs for both applicants and the E-rate program once deployment is complete.**

An area currently not being addressed by E-Rate is metropolitan area network (MAN) fiber connectivity between schools. School Districts have two basic options to provide Internet access to schools; (1) purchase a connection from the Internet service provider to each school, or (2) purchase a single connection to the District network operations center (NOC) from the Internet service provider, and then provide connectivity from the NOC to each school to share the single high-capacity broadband Internet connection.

In the first scenario, the cost for Internet access for multiple smaller Internet connections to each school is going to be more than the cost for the same aggregated bandwidth delivered to the NOC. Additionally, if a separate Internet connection is delivered to each campus, and some campuses are not fully utilizing the entire amount of that bandwidth, there is not easy way to share the excess bandwidth with a campus that is utilizing 100% of their Internet bandwidth.

With the second scenario, you achieve economy of scale by being able to purchase one large Internet connection, which means the amount of E-Rate funding required for the same amount of high-capacity internet connectivity at the schools is less. This single Internet “pipe” is also shared among all schools, so it is easier to use a greater percentage of what is being paid for without some campuses suffering from not having enough bandwidth. The issue that needs to be is that there still needs to be a means to share that single high-capacity Internet connection with the schools. This can be accomplished by leasing a telecom circuit between the NOC and each school, or by installing a fiber-optic cable or microwave link between the NOC and each school.

Lease costs for the telecom circuit are an ongoing Priority 1 service cost, and will likely offset the E-Rate savings gained by moving to a single, larger Internet connection. The microwave link is a one-time cost, and the equipment should last for 5-7 years, however, there are limitations on throughput and if available, the cost for 10 Gbps microwave connectivity is probably cost prohibitive. Allowing school Districts to install fiber-optic cable to connect their NOC to each campus provides a one-time cost. The fiber-optic cable is currently capable of transmitting at speeds of 1 Gbps up to 10 Gbps or even 40 Gbps at a reasonable cost for the fiber-optic transmit modules.

Weslaco ISD has found that fiber-optic cable, installed using directional boring, is the most cost-effective long-term solution to connectivity for our school district. As such, Weslaco ISD would like to see the cost of installation of private fiber-optic cable between a school district network operations center and each school in the district added to the eligibility list. Weslaco ISD has installed over 26 miles of fiber-optic cable connecting almost all of our schools and is able to provide 10 Gbps redundant connections to every campus with no monthly recurring cost for transport circuits. In a study conducted in 2011, Weslaco ISD calculated that to lease the circuits necessary to provide the 1 Gigabit and 10 Gigabit connections that we were providing to each of our campuses would have cost approximately \$12,957,840 per year. That breaks down to \$11,532,477 in E-rate funding and \$1,425,362 in school funding. If Weslaco ISD had not invested \$1.8m to install this private fiber-optic ring, we would not be able to provide the same level of connectivity to our schools that we are now able to provide. Unnecessary leasing of telecommunications circuits that could be replaced over time with school owned fiber-optic cable

amounts to hundreds of millions of dollars annually. For Weslaco ISD alone, we are NOT requesting \$11.5m in funding each year solely because we own our own fiber to most of our schools.

**¶30 – We seek comment on how best to distribute support among applicants for high-speed connections to schools and libraries.**

Weslaco ISD firmly believes that every school eligible for E-Rate funding should be allocated a portion of the total available E-Rate funds each year using the Simplified Funding Formula included as an attachment with the FCC Public Notice (WC Docket No. 13-184) with the following modifications:

- Dissolve the current distinction between Priority 1 and Priority 2 services and allow schools to spend their funding allocation on eligible equipment and services in the way that makes the most sense for the district.
- Allow the school district to aggregate the allocations for all schools in the district and spend the portion of their total allocation at each campus that they believe best meets the needs of their schools and the district as a whole.
- Remove the 2-in-5 rule which currently leads to over-buying.

Implementing the Simplified Funding Formula with these modifications provides an amount of money each year that schools can plan on, equitably distributes funds among all eligible entities, and provides incentive for districts to spend their allocation wisely.

**¶31 – We seek comment on ways to prioritize applications for deployment costs in the event that the demand for such funds exceeds availability.**

Weslaco ISD advocates use of the same funding approach that is currently used, 90%, 89%, etc., tempered with the addition of highest percentage free and reduced lunch for applications within a funding band. Implementation of the Simplified Funding Formula, as previously discussed, would eliminate the issue of demand exceeding supply since each eligible entity would have a pre-determined allocation for the E-Rate funding year that they could use to address their needs.

**¶32 – We seek comments on adopting one or more objective impact and/or efficiency metrics to prioritize applications.**

Weslaco ISD recommends the implementation of an “efficiency points system” for upgrades, such as from two T3 circuits to a single 100Mbps metro Ethernet circuit, where the circuit and internet access costs post upgrade are significantly less than pre-upgrade. By prioritizing applications that promise more efficient use of the E-Rate funds, you will be providing incentives for schools to find creative ways to reduce long-term costs.

**¶36 – Should the Commission require applicants that are seeking E-rate support for upgrading high-capacity connections to school buildings or libraries to demonstrate that they have a plan and the capacity to use those services within their buildings?**

Weslaco ISD absolutely agrees with a requirement for these applicants to demonstrate the existence of a plan and the capacity to use the services.



**¶41 – We seek comment on an approach to phase out support for voice services by gradually reducing the support for voice services over at five-year period.**

Weslaco ISD supports the gradual reduction of funding for voice services over a five year period – provided funding is made available on a “free and reduced lunch” weighted student-count formula that provides each school with a predictable multi-year budget that allows them to plan for and implement the changes necessary to migrate from traditional voice services to VOIP.

**¶44 – We seek comment on whether there are any voice services that should be excluded from the phase out?**

Weslaco ISD proposes that certain voice services be excluded from the phase-out plan. These would include inbound/outbound trunks at network operations center for districts that choose to maintain VOIP within the district only, and still rely on POTS for outside connections, and telephone lines for elevators and alarm systems.

**¶46 – Should the Commission consider eliminating all support for voice services starting in funding year 2015?**

Weslaco ISD advocates for continuing funding for specific voice services as detailed in ¶44 above.

**¶47 – We seek comment on retaining support for voice services under a lower priority.**

Weslaco ISD sees this as a viable alternative that would provide incentive for schools to move away from voice services, while still providing funding for these services at a lower discount rate (not priority) for services that need to be continued (i.e. elevator phone lines, etc.)

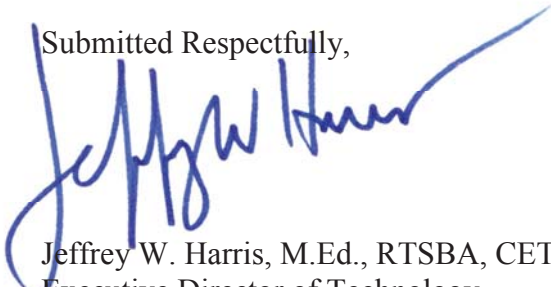
**¶56 – We invite suggestions of other types of projects the Commission should conduct with regard to meeting school/library connectivity needs, the amount that should be spent on any individual project, and the total budget for such projects.**

Weslaco ISD would like to see the cost of installation of Metropolitan Area network (MAN) fiber-optic connections (private fiber-optic cable between a school district network operations center and each school in the district) to be added to the eligibility list. Weslaco ISD has invested a significant amount of money in establishing a private fiber-optic ring for our school district that is extremely cost effective. When compared to the cost of leasing a comparable telecommunications circuit, the installation of the fiber-optic cable was shown to have a 50 day payback period (without E-rate discounts) and a 1.26 year payback if you factor in our 89% E-rate discount.

Many school districts currently lease telecommunications circuits to interconnect their network operations center with the individual schools. In situations where the circumstances allow, installation of private fiber-optic cable, owned by the school district, could save millions of dollars annually. In a study conducted in 2011, Weslaco ISD calculated that to lease the circuits necessary to provide the 1 Gigabit and 10 Gigabit connections that we were providing to each of our campuses would have cost approximately \$12,957,840 per year. That breaks down to \$11,532,477 in E-rate funding and \$1,425,362 in school funding. If Weslaco ISD had not invested \$1.8m to install this private fiber-optic ring, we would not be able to provide the same level of connectivity to our schools that we are now able to provide. Unnecessary leasing of telecommunications circuits that could be replaced over time with school owned fiber-optic cable amounts to hundreds of millions of dollars annually. For Weslaco ISD alone, we are NOT

requesting \$11.5m in funding each year solely because we own a private fiber-optic network that provides connectivity from our network operations center to our schools.

Submitted Respectfully,

  
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